

### **REMARKS**

Claims 8 and 15-31 are pending. In the Office Action mailed on June 16, 2005, the Examiner: objected to Figure 1 of the drawings; rejected claims 8 and 15-31 under 35 U.S.C. § 112, first paragraph; rejected claims 8 and 15-31 under 35 U.S.C. § 112, second paragraph; rejected claims 15-17 and 24-26 under 35 U.S.C. § 101; rejected claims 8, 15-17, 21-26, 30 and 31 under 35 U.S.C. § 102(e) over U.S. Patent No. 6,005,568 to Simonoff et al. ("Simonoff"); rejected claims 20 and 29 under 35 U.S.C. § 103(a) over Simonoff; and rejected claims 18, 19, 27 and 28 under 35 U.S.C. § 103(a) over Simonoff in view of U.S. Patent Application No. 2002/0049788 to Lipkin ("Lipkin"). Applicants herein amend claims 8, 15-17, 19 and 23-31 to more particularly point out and distinctly claim Applicants' invention. Further examination and review in view of the amendments and remarks below are respectfully requested.

Applicants' techniques are directed to a network centric, thin client HTML application for enabling rapid and easy configuration of page delivery language objects. In some cases, Applicants' techniques involve configuring display objects by defining a relevant business object model, building and configuring display objects based on the business object model, and assembling the display objects into a thin client application. The business object model is defined using style sheets and templates, and the display objects are stored separately from the style sheets and templates.

#### **I. Drawing Objection**

The Examiner objected to Figure 1 of the drawings for not being designated as "Prior Art." Applicants herein submit a replacement Figure 1 to address the particular concerns raised by the Examiner.

#### **II. Rejections under 35 U.S.C. § 112, first paragraph**

The Examiner rejected claims 8 and 15-31 as failing to comply with the enablement requirement. In particular, the Examiner stated that "[t]he specification appears to be

written for one who has a working knowledge of Siebel's web engine." Applicants respectfully disagree. References in the Specification to Siebel and Siebel's web engine are provided only as one example of a suitable server application, and an understanding of Siebel's web engine is not necessary for one of ordinary skill in the art to make and/or use Applicants' described techniques.

The Examiner also stated that "an object is defined as 'a repository representation of an HTF'" and that "'HTF' is never similarly defined." Applicants respectfully disagree. Regarding the term "display object," this term is described throughout the Specification (See, for example, paragraphs [0009] and [0036], and Figure 3). The reference to "HTF" is provided as an example of a suitable repository for the display object, and is not necessary for understanding the term "display object."

The Examiner also indicated that the term "applet" seems to be used in a different manner than its common meaning. Applicants respectfully disagree. "Applet" is described throughout the Specification (See, for example, paragraphs [0009], [0010], [0030] and [0042], and Figure 3).

The Examiner indicated that claim 8, as worded, is unclear as to its meaning. Applicants herein amend claim 8 to address the Examiner's concerns.

The Examiner also stated that "business object model is not adequately defined." Applicants respectfully disagree. "Business object model" is described throughout the Specification (See, for example, paragraphs [0010] and [0040]).

### **III. Rejections under 35 U.S.C. § 112, second paragraph**

The Examiner rejected claims 8 and 15-31 as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. Applicants herein amend claims 8, 15-17, 19 and 23-31 making the Examiner's rejection moot. Claims 18 and 20-22 continue to depend from claim 8.

**IV. Rejections under 35 U.S.C. § 101**

The Examiner rejected claims 15-17 and 24-26 for reciting an improper process claim. Applicants herein amend claims 15-17 and 24-26 to address the Examiner's concerns. In particular, Applicants: amend claims 15 and 24 to each explicitly recite "wherein the task is order entry;" amend claims 16 and 25 to each explicitly recite "wherein the task is product configuration;" and amend claims 17 and 25 to each explicitly recite "wherein the task is bid preparation."

**V. Rejections under 35 U.S.C. § 102 and 35 U.S.C. § 103**

All of the claims stand rejected over Simonoff, either alone or in combination with Lipkin. Applicants respectfully traverse the Examiner's rejections.

Claims 8 and 15-31 each recite (1) a business object model for a thin client user interface, the business object model for performing a task, (2) display objects based on the business object model, the display objects containing information about tags, wherein the tags provide directives for creating at least one web page that is used to perform the task, and (3) templates for controlling the presentation of the display objects, each of the templates containing at least one placeholder, the at least one placeholder having an attribute for binding the placeholder to an associated display object. In rejecting the claims, the Examiner indicated that (1) Simonoff's dedicated scripting language (col. 3, lines 44-59) corresponds to Applicants' business object model for performing a task; (2) Simonoff's GUI objects and scripts (col. 5, lines 43-53) correspond to Applicants display objects based on the business object model; and (3) Simonoff's applet tag for invoking a Universal Client device (col. 5, lines 54-67) corresponds to Applicants' templates for controlling the presentation of the display objects, where each of the templates contains at least one placeholder having an attribute for binding the placeholder to an associated display object.

Applicants respectfully disagree. Simonoff does not disclose, suggest or teach a business object model for performing a task, nor does it disclose, suggest or teach display

objects based on the business object model, nor does it disclose, suggest or teach templates for controlling the presentation of the display objects, where each of the templates contains at least one placeholder, as recited. Instead, Simonoff merely describes a Universal Client with a self-contained scripting language called GUIScript, which forms a computer architecture independent device for generating and displaying a GUI. (See Abstract.) In particular, the Universal Client device is a software application that understands GUIScript. (col. 7, lines 4-8.) In execution, the Universal Client device will load and interpret a GUIScript and prepares and projects the scripted GUI onto the screen of the client host. (col. 9, lines 44-56).

With regard to Applicants' business object model for performing a task, Simonoff merely states that one of its objectives is providing a dedicated scripting language that enables each military component to quickly and easily personalize the user front end, which presents the GUI objects, without modifying the same software program application used by all networked military components, thus enabling the Government to simultaneously achieve military component interoperability and cost savings regardless of computer variation and architecture. (col. 3, lines 44-59.) Applicants are unclear as to how Simonoff's stated objective discloses or teaches Applicants' business object model for performing a task. As Applicants are unable to find in Simonoff any disclosure or teaching of a model or business object model, Applicants respectfully request that the Examiner explain with the required specificity how col. 3, lines 44-59 of Simonoff identically discloses Applicants' business object model for performing a task.

With regard to Applicants' display objects based on the business object model, Simonoff merely states that the GUI objects are defined by scripts. (col. 5, lines 43-53.) According to Simonoff, the scripts are used to personalize the user front end (col. 3, lines 51-53.) In contrast, Applicants' display objects are based on the business object model, which is a model for performing a task. Applicants can find in Simonoff no such disclosure or suggestion.

With regard to Applicants' templates for controlling the presentation of the display objects, where each of the templates contains at least one placeholder having an attribute for binding the placeholder to an associated display object, Simonoff merely describes an applet tag that is included in an HTML document, and which is used for invoking a Universal Client device. (col. 5, lines 54-67.) In Simonoff, the Universal Client device is embedded as an applet tag in a World Wide Web page. (col. 8, lines 42-44.) Thus, one may reasonably assume that an applet tag in a World Wide Web page functions as a placeholder for a Universal Client device, which, according to Simonoff, is a software application. (col. 7, lines 5-6.) In contrast, Applicants' placeholder has an attribute for binding the placeholder to an associated display object. Applicants can find in Simonoff no such disclosure or suggestion.

## VI. Conclusion

In view of the foregoing, Applicants respectfully submit that claims 8 and 15-31 are allowable and ask that this application be passed to allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8000.

Dated:

August 4, 2005

Respectfully submitted,

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Attachments

**AMENDMENTS TO THE DRAWINGS**

The attached sheet(s) of drawings has been amended to include the Examiner's recommendation that Figure 1 be designated as Prior Art.

Attachment:      Replacement sheet  
                         Annotated sheet showing changes

**ANNOTATED SHEET**

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(1)  
**SERVER**  
 -All applications/logic reside on server  
 -All applications execute on server.  
 -All data resides on server ('plex?)  
 -Launch apps in platform independent form (e.g., HTML, with ActiveX).  
 -Launch and embed Windows based apps into HTML pages  
 -Centralized management, tech support, control => consistency across net; ease of upgrades; seamless integration.  
 -Security – files NOT sent across net.  
 -Data can be on a “remote” remote server, as can applications/logic/processing.

NETWORK

(3)

Low bandwidth  
 Standard network protocols

(5)  
**THIN CLIENT**  
 -User interface to apps running on server.  
 -No other to upgrade here (except browser)  
 -Cross platform capability (any browser for HTML thin client).

**Figure 1** (PRIOR ART)

